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R04-17-A-038

707 E. Main Ave
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Neighborhood & Community Services Department

December 21, 2016

Barbara Alfano
Brownfields Coordinator
USEPA Region IV
Atlanta Federal Center
61 Forsyth Street, S.W. 10th FL
Atlanta, GA 30303-8960

Re: City of Bowling Green, KY USEPA Brownfields Assessment Grant

Dear Ms. Alfano:

The City of Bowling Green is seeking \$300,000 in U.S. Environmental Protection Agency (USEPA) brownfield grant funds to identify and address sites with potential contamination of hazardous substances, and pollutants in the City. Per the USEPA guidance document, we are providing the following information

- a. Applicant Identification:
 - City of Bowling Green
 - P.O. Box 430
 - Bowling Green, KY 42102-0430
- b. Funding Requested:
 - i) Grant type: Assessment
 - ii) Community-wide
 - iii) Federal Funds Requested: \$300,000
 - iv) Contamination: Hazardous Substances (\$200,000) /Petroleum (\$100,000)
- c. Location: City of Bowling Green, Warren County, Kentucky
- d. Property Information for site specific proposals: N/A
- e. Project Contacts
 - i.) Project Director
 - Mr. Nick Cook
 - City of Bowling Green
 - Grants Coordinator
 - P.O. Box 430
 - Bowling Green, KY 42102-0430
 - nick.cook@bgky.org
 - 270-393-3659

ii.) Chief Executive/Highest Ranking Official

Mayor Bruce Wilkerson
City of Bowling Green
P.O. Box 430
Bowling Green, KY 42102-01430
bruce.wilkerson@bgky.org
270-393-3000

f. i) Population: The population of the City of Bowling Green is 58,067 (2010 Census)

ii) N/A

iii) Warren County, Kentucky is not experiencing persistent poverty.

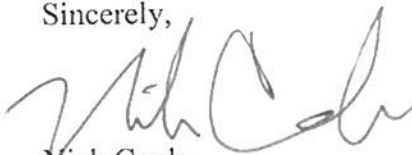
g. Regional Priorities Form/Other Factors Checklist is attached.

- Regional Priority Title: Assistance to Communities That Have Limited In-House Capacity to Manage Brownfield Properties, Pages 4 and 5.
- Assessment Other Factors Checklist, Other Factor: Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation, Page 9; Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base, Pages 4 and 5.

h. Letter from the state is attached.

The City of Bowling Green launched an initiative to make investments for long term improvements in the neighborhoods with the lowest incomes and highest minority concentrations. The decline of industries over last several decades in these neighborhoods has left many brownfields that hinder private investment and new development. The City would be very grateful to be selected for brownfield grants to apply to these neighborhoods and create economic opportunities for residents. We thank you for the opportunity to apply for these important funds.

Sincerely,



Nick Cook
Grants Coordinator

1. Community Need (45 points)

1a. Target Area and Brownfields (15 points)

1.a.i. Community and Target Area Description (5 points)

The City of Bowling Green is located in Warren County in South-Central Kentucky along Interstate 65, William Natcher Parkway, the Barren River, and CSX Railroad. According to the 2010 Census, Warren County has a population of 113,792 of these 58,067 are within the City. Warren County is 580 square miles in size and Bowling Green comprises 38.5 square miles of that. Bowling Green lies completely in a karst landscape typified by water flowing underground in well-connected systems of sinkholes, springs, and caves. It is also the home of the Corvette and Western Kentucky University (WKU).

During creation of the City's current Consolidated Plan, data analysis identified six Census tracts (101, 102, 103, 104, 105, and 112), comprising approximately 5.6 square miles, as having the lowest income, most housing problems; and more racial, ethnic, and cultural diversity than the City as a whole. With input from meetings with residents, service providers, and stakeholders the City designated the above tracts as the Bowling Green Reinvestment Area (BGRA), and dedicated the majority of its annual Community Development Block Grant (CDBG) allocation to make investments in this area one neighborhood at a time.

Once the commercial and industrial hub of the City; decades of decline have resulted in many shuttered and dilapidated buildings in the BGRA. Within the BGRA is the Westside Neighborhood (WSN) alongside the Barren River. While the BGRA is the comprehensive target area, the WSN will be the central focus of our assessment program. The WSN was once the most highly industrialized and currently the most negatively impacted area of Bowling Green. Within its southwestern boundaries lies a high density, low income, mostly minority neighborhood. The relatively small WSN includes a RCRA corrective action site, an abandoned federal Superfund landfill, two state Superfund sites, 14 temporarily closed gasoline stations and many other derelict properties. Priority sites include an abandoned tobacco warehouse/cigarette factory, a legacy coal fired power plant site, two scrap yards, the former PET Milk Factory and the closed former Fruit of the Loom textile facility. Hazardous funds will be used to conduct soil/groundwater and building materials testing for volatile organic compounds (VOCs), metals, PCBs, PAHs, asbestos, lead-based paint and mold. Petroleum funds will be used to assess the two scrapyards and the abandoned and underutilized gasoline stations.

The WSN has been experiencing job losses and business declines for many decades, resulting in lower property values, a decline in tax base, and increasing environmental justice concerns. Grant funds will be used to evaluate these facilities in an effort to revitalize the community. This area includes subsidized housing residents including both the elderly and children of the unemployed. These brownfield sites pose a hazard to this sensitive population and are in great need of assessment and cleanup.

1.a.ii. Demographic Information and Indicators of Need (5 points)

The summary statistics below indicate how strongly our area is in need. A staggering number live in poverty: more than double the state and national level. The unemployment level is significantly higher than the local, state, and national numbers, and the median household income is much lower than all three criteria factors as well. The percentage of minorities is much higher than the city and state averages. 12% of the residents don't own a car. Brownfields funding can stimulate new economic activity improving these environmental justice factors.

	BGRA	Bowling Green	Kentucky	United States
Population ¹	21,492	58,067	4,339,367	308,745,538

Unemployment ²	14.7%	7.3%	9.8%	9.7%
Poverty Rate ²	30.4%	21.2%	14.4%	11.3%
Percent Minority ¹	39.2%	30.6%	15.2%	43.9%
Median Household Income ²	\$20,401	\$33,714	\$43,026	\$53,046
Female Head of Household ¹	20.6%	14.1%	12.7%	13.1%
Homes built prior to 1939 ²	18.5%	7.8% ³	9.9%	13.1%
Per Capita Income ²	\$11,764	\$19,792	\$23,462	\$28,155
Population with no Vehicle ²	12.1%	4.7%	2.6%	4.5%
Population Walking to Work ²	10.4%	5.4%	2.2%	2.8%

¹Data is available from the 2010 U.S. Census and is available at www.census.gov

²Data is available from the U.S. Census 2014 American Community Survey and available on American Fact Finder at <http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml>

1.a.iii. Brownfields and Their Impacts (5 points)

The City's drinking water comes from the Barren River, which is fed by the vast underground karst network that is in turn fed by surface runoff, and very susceptible to pollution.

Brownfields are in close proximity to the river and residential properties. These brownfields are a potential source of a number of environmental issues including soil and groundwater contamination from legacy scrapyards, gasoline stations, factories (textile, foods, and cigarette), a coal-fired power plant and two, closed landfills. The impacts are likely leading to health hazards due to *dermal* exposure (metals and VOCs), *inhalation* from airborne contaminants (asbestos and lead based paint), and *ingestion* from metals, lead-based paint and volatile organic compounds. All surface water from the BGRA flows northward directly into the Barren River. As indicated by using the USEPA developed Environmental Justice (EJ) Screen tool a disproportionate share of these negative impacts has fallen on minorities and the elderly. Also there is a homeless shelter in close proximity to these brownfields. High cancer risks, a high respiratory hazard index, elevated diesel particulates and proximity to waste water discharges contribute to localized brownfield health impacts.

	BGRA	Bowling Green	State	United States
Diesel Particulate Matter	1.28	0.992	0.667	0.937
Cancer Risk (lifetime per million)	51	42	39	40
Respiratory Hazard Index	2.3	1.8	1.6	1.8
Risk Managed Site Proximity	0.72	0.41	0.37	0.43
Water Discharge Proximity	0.59	0.19	0.24	0.31

Data from the 2016 EJSreen Tool

Priority sites include an abandoned tobacco warehouse/cigarette factory, a legacy coal-fired power plant, two underutilized scrap yards, the former PET Milk Factory, a former Fruit of the Loom textile facility, two legacy landfills, and abandoned gasoline stations. Hazardous funds will be used to conduct soil/groundwater and building materials testing for the presence of volatile organic compounds, metals, PCBs, PAHs, asbestos, lead-based paint and mold. Petroleum funds will be used to assess the two scrapyards, a former coal storage yard and power plant, and the abandoned and underutilized gasoline stations. The legacy highly industrial area is within the WSN. Contaminant exposures (dermal, airborne and ingestion) are inescapable for this highly sensitive, low income population. Children are known to transgress and congregate at abandoned properties. The lack of consistent transportation to grocery stores has created a food desert and unhealthy food choices. Local residents often grow their own produce. Industrial contaminants often become airborne and may be responsible for elevated cancer rates and the

negative respiratory effects shown by the EJScreen tool. Below are brownfield examples and their potential impacts.

Brownfields	Associated Contaminants	Associated Health Effects	Redevelopment Potential	River Distance	Housing Distance
PET Milk Factory	Lead, Asbestos	Brain growth, lower fertility, lung cancer	Commercial	500 feet	300 feet
College St. Bridge	Lead	Brain development, lower fertility	Public Park, Boating & Fishing Facilities	0 feet	400 feet
Quick Stop Gas Station	Petroleum	Ground water contamination	Commercial	3 miles	250 feet

1b. Welfare, Environmental, and Public Health Impacts (15 points)

1.b.i. Welfare Impacts (5 points)

Welfare impacts include a number of dilapidated structures and blighted areas, lower incomes, lack of service businesses, and higher crime. Data analyzed by the City's Police Department during the previous year shows that while the BGRA is only 13% of the City's total area crime in the BGRA accounted for 36% of the City's total crime. Furthermore 50% of all murders, 37% of all robberies, and 40% of all auto thefts occurring in the City during this time period took place in the BGRA. Impacts to sensitive populations include young children of low-income families and the elderly which account for over 30% of the area's population. In the BGRA more than 1 out of every 10 people don't have access to personal transportation. Female head of households with no husband present, 21%, are more concentrated in the BGRA than in any other part of the City. With the last remaining grocery store closing in recent years, the area is now without fresh food choices and is characterized as a food desert.

1.b.ii Cumulative Environmental Issues (5 points)

Cumulative environmental issues within the BGRA and especially the WSN include environmental contaminant impacts from legacy industrial activity that have impacted soil, surface water, groundwater and the water quality of the adjoining Barren River. Specifically, 1) two closed landfills, 2) a former (now closed) coal-fired power plant that was situated along Power Street and adjacent to the Barren River, 3) a still very active and very dangerous electrical transmission substation 4) two active scrap yards, 5) three active paint shops, 6) and many abandoned gasoline stations.

Our karst landscape makes water especially vulnerable to pollution from surface impacts. The karst landscape also contributes to numerous sinkhole collapses each year in the City which makes the above ground structures in the community more susceptible to collapse. A notable karst event occurred just a few years ago in Bowling Green at the National Corvette Museum where a 40' wide, 25' deep sinkhole swallowed eight antique cars.

As mentioned in the welfare impacts section, personal transportation is lacking in the BGRA. Pedestrian travel is a common means of accessing goods and services. With daily traffic counts of 14,000 and 20,000 respectively, the high speed and high volume of traffic from two state highways creates dangerous crossing for pedestrians in the BGRA, which includes students walking to school and residents trying to access retail stores and other destinations. Sadly two young children have died in recent years while trying to cross these roads.

The targeted community for the proposed grants have several environmental justice factors to be considered to support community need. The area is home to water and wastewater treatment plants. As indicated the BGRA has a poverty rate above 30%, which is far higher than the national average of approximately 11%.

1.b.iii. Cumulative Public Health Impacts (5 points)

In the BGRA and the WSN there are many community public health impacts, especially to our sensitive and minority groups. These brownfields have led to a very poor living environment for our elderly, children, disabled, low income, and pregnant women. The high percentage of minorities (40%) coupled with a high poverty rate (30%) and a high cancer rate illustrate the sensitivity of the local residents and their poor health outcomes from living in this area. The cumulative impacts of VOCs, metals, particulates, PCBs and asbestos to soil, surface water, air and ground water are negatively affecting our high percentage of minorities and sensitive subgroups. This has led to a very high environmental justice problem that the City of Bowling Green is trying to address. Exposures to these pollutants include 1) ingestion from soil contaminant uptake from local gardens and surface waters which our children play and congregate, 2) inhalation from dusts and particulates from legacy landfills, scrapyards, paint-shops, and asbestos/lead-paint exposure from abandoned buildings 3) dermal exposure to our children from soils, 4) as well as, exposure to electromagnetic field (EMF) radiation from the electrical substation; which can be a significant health impact to our sensitive population.

The facilities listed above, along with many others, potentially increase the risk for the population of the BGRA being exposed to environmental factors that subsequently increase the prevalence of health issues such as cancer and asthma. Abandoned and underutilized buildings can contribute to environmental exposures to our children and the elderly, and include lead, asbestos, hazardous chemicals, and petroleum products. Lead from abandoned buildings is especially harmful to children, and slows brain development. The presence of asbestos in the previously mentioned brownfields may be an important factor in local lung cancer rates.

There is the potential for children to play on these abandoned properties potentially exposing them to metals and other hazardous chemicals. These environmental issues adversely impact these already impoverished neighborhoods through the increase in health care costs associated with cancer and asthma further exacerbating the high poverty rates (30%). Within the BGRA the presence of brownfields is negatively affecting the growth of industry, commercial, and residential revitalization. The proposed Brownfields program removes and decreases these barriers, clears the perception of the potentially contaminated sites, and provides for new economic opportunity and improved health outcomes.

1c. Financial Need (15 points)

1.c.i. Economic Conditions (5 points)

With a 21% growth rate from 2000-2010, the City of Bowling Green is the fastest growing City in Kentucky. This growth has challenged the City with continuing to provide the same level of expected services while maintaining a low tax rate for its predominantly low to moderate income population. While the City Bowling Green continues to grow, City taxes have remained steady with no increases in 14 years. This has been important for the 57% of the population that is considered low to moderate income. And with a per capita income 54.5% below the national average, the City continues to try to ease the tax burden on its citizens. As a result of the constant rate in taxes, the City's budget sees minimal annual increases and a continued focus on providing required services in its rapidly growing service area.

During the economic downturn that took place around 2008-2010, the City saw a period of decline in tax revenues, and was required to downsize 5% of its workforce through layoffs, consolidating positions and leaving vacant positions from retirements and resignations unfilled. The City has not yet fully restored staff to the prior levels and as a result has reduced some services. The City lacks the in-house expertise and equipment to conduct environmental

assessments and ACBAs necessary for brownfields cleanup. Therefore the City requires funding to procure a consulting firm with the necessary background and expertise for the implementation of a successful brownfields program.

During the recent Great Recession companies such as Fruit of the Loom, Eagle Industries, Siegel-Robert Automotive, and DESA International collectively laid off over 1,000 workers through downsizing and closures. Most recently two of the area's largest employers, WKU and Kentucky Community Technical College, collectively received over \$30,000,000 in budget cuts from state government resulting in sweeping layoffs, hiring freezes, and furloughs.

1.c.ii. Economic Effects of Brownfields (10 points)

Once the industrial and commercial hub of the City, the BGRA has experienced decades of decline from industrial and commercial loss. Industrial facilities are now concentrated in large industrial parks located adjacent to the interstate system. Without personal transportation and no public transit access to these new locations, many residents do not have access to the area's employment opportunities. In the demographics table provided above, the per capita income of the BGRA is a disappointing \$11,764, which is drastically lower than the overall city, state, and nation averages. More than 20% of the homes in the BGRA have a female head of household with no husband present; a number much higher than the city, state, and national percentages. Thirty percent of the homes in this area were built in 1939 or earlier, which represents 65% of the City's total number of houses built during that period. With a median household income at 47% of the state and 38% of the national averages, and an unemployment rate substantially higher than these indicators, it is extremely difficult for these residents to invest in their homes and neighborhoods. Many of the properties throughout the BGRA contain dilapidated and abandoned structures, which include a large number of former industrial and commercial sites. This contributes to lower property values. For example, Census Tract 102 of the BGRA contains several of the aforementioned potential brownfield properties. Median value in dollars of owner occupied housing units in census tract 102 of the BGRA is \$65,000 as opposed to the \$135,000 for the City as a whole. This area's property values are only 48% of the City's, indicating that the prevalence of brownfield properties is having a direct impact on property value and are a deterrent for new private investment into the area.

Our brownfields are concentrated in areas where decades ago river and rail transport were the primary means of moving raw materials and manufactured goods. These previously-commercial districts have declined as the manufacturing and industrial community migrated toward areas where the interstate highway system is more accessible. Further, tax-incentivized commercial and industrial parks have lured industries away from historical commercial districts to the fringes of the community where they enjoy more modern facilities and lower taxes. For example, just two years ago a company located in the BGRA closed its operations, leaving approximately 300 people unemployed. This contributed to the unemployment numbers listed above and severely decreased occupational tax revenue. The company's large campus of facilities remains largely unused, and parts are now brownfields. The question of how to address the environmental legacy of the relics of the industrial activity looms. The infrastructure is degraded and requires more frequent and costly maintenance. They typically require more public works crews, code enforcement inspectors, police officers, and fire fighters to respond to incidents and safety issues than occupied properties. Elimination of brownfields will contribute towards the revitalization of the City's lowest income neighborhoods.

2. Project Description and Feasibility of Success (55 points)

2a. Project Description, Project Timing, and Site Selection (30 points)

2.a.i. Project Description and Alignment with Revitalization Plans (17 points)

The downtown core of Bowling Green is comprised of six Census tracts which have the lowest income, oldest housing stock, and highest concentration of minorities than the City as a whole and include the WSN. This area was once home to the majority of the City's commercial and industrial facilities, but decades of decline have resulted in many derelict properties. With input from residents, service providers, and stake holders, the City designated this area as the Bowling Green Reinvestment Area (BGRA), and dedicated 80% of its annual CDBG allocation and \$200,000 of yearly local general funds for long term investments in this section of town. This area has also been designated by HUD as a Neighborhood Revitalization Strategy Area.

The City's three main priorities in the BGRA, and especially in the WSN, are quality affordable housing, economic opportunities, and healthy neighborhoods. With funds and expertise from the USEPA Brownfields Program activities will be undertaken to improve infrastructure, remove blight, identify and cleanup brownfields, create new job opportunities, and improve the availability quality and affordable housing. Activities are ongoing in this area for park improvements, public infrastructure improvements, small business development, and rehabilitation of rundown residential and commercial properties. The City has a long-term strategy and commitment to improve our community's livability by focusing heavily on our urban core where our citizens can live, work and thrive. Funding received from a Hazardous Substances and Petroleum Assessment grant has been prioritized to include assessments of: 1) the former Pet Milk Factory (asbestos, lead-paint, mold) 2) the abandoned tobacco/cigarette factory (asbestos, lead-paint, PAHs) 3) the former coal-fired power plant along the Barren River (PAHs, metals) 4) two scrap yards (VOCs, Metals) 4) the closed Fruit of the Loom Factory (Asbestos, lead-based paint, PAHs, VOCs, BTEX) 5) comprehensive regulatory file reviews of the two abandoned landfills) up to assessments of up to 5 former, now abandoned, gasoline stations, including the former Quick Stop Station (BTEX, metals), 6) the old College Street Pedestrian Bridge (metals), 7) and up to ten surface water discharge points from the above-referenced facilities. Projected redevelopment priorities of accessed properties includes new affordable housing, commercial businesses for job creation, and new parks and greenspace. Additionally, the old College Street Pedestrian Bridge that crosses the Barren River to the North has known lead contamination that is hindering waterfront development. The extent and severity of the contamination are unknown and the bridge serves to connect pedestrians between parks on either side of the river. Once reclaimed, the area can be dedicated to public access to the river. Finally, among several suspected remaining underground storage locations the former Quick Stop location is of particular note as it is currently being underutilized as a used car lot. The area surrounding this location is mix of retail and light industrial and could be marketed for more employment intensive uses if reclaimed.

2.a.ii. Timing and Implementation (13 points)

The City of Bowling Green has established assessment and redevelopment strategies from past working groups for the BGRA. A formal Bowling Green Brownfield Committee (BGBC) will be established to manage all grant activities. All uses of federal funds, *including contractor procurement*, will be conducted in compliance with the USEPA Cooperative Agreement including, but not limited to: 1) the Davis-Bacon Act, 2) MBE/WBE Compliance (40 CFR, Part 33, Subpart E), 3) six good faith procurement efforts (40 CFR, Part 33, Subpart C), 4) maintaining a bidders list and competitive bidding (40 CFR Section 33.501. Our grants coordinator Nick Cook will oversee all work associated with the grant to ensure compliance with the approved work plan and the USEPA Cooperative Agreement. Our assistant grant coordinator

will be Mr. Matt Powell, who is a City employee and highly experienced environmental scientist including experience working for the Kentucky Department for Environmental Protection, adding valuable environmental oversight to the grant. We have a well-established decision-making process that is very transparent and involves the entire community. Through the successful completion of many federal grants we have demonstrated that we know how the process works, and that we have the mechanisms in place to successfully complete the grant. We will also involve our state brownfields program in all facets and will work closely with our USEPA Region 4 team. By the end of year one we will have: 1) hired our selected consultant, 2) completed the generic QAPP, 3) developed a community outreach and education plan, 4) activated our BGBC, 5) submitted quarterly USEPA reports, 6) populated the ACRES database, 7) completed 6 Phase I ESAs, 8) completed 3 Phase II ESAs, 9) completed 2 ABCAs, and, 10) held 4 community meetings. By the end of year 2 we will have completed 1) 10 phase I ESAs and 6 Phase II ESAs and, 2) completed 8 community meetings. By the end of year 3 we will have 1) completed 12 Phase I ESAs, 2) 8 Phase II ESAs, 3) four ABCAs, and 4) submitted the closeout documents and updated the ACRES database.

The BGBC will have a grant kick-off meeting as soon as we receive our Cooperative Agreement. We will procure our environmental contractor and conduct our first public BGBC meeting immediately after award. Our environmental consultant will prepare the generic quality assurance project plan (QAPP) and other planning documents. The City will prepare a brownfields presentation to be used at all public meetings. We will conduct BGBC meetings at least quarterly where the public will have an opportunity to present sites to the BGBC for consideration. Once a site is approved, we will engage our environmental consultant to obtain site access and conduct the Phase I/II environmental site assessments (ESA)s and prepare analyses of brownfields cleanup alternatives (ABCAs) on select sites. The City will prepare and submit quarterly and annual reports to the USEPA and prepare closeout documents in accordance with our approved USEPA work plan. For site inventory/selection, the BGRA has been thoroughly inventoried by the City, and partnering community organizations such as Habitat for Humanity and the Greenways Commission. During the term of the grant we expect that other property owners and developers will come forward to access grant funds.

(b) Development of site inventory or site identification process, and site prioritization and selection process (5 points)

The BGBC will develop a formal site ranking and scoring process for site selection. Sites selected must meet the following criteria: 1) eligible for assessment based on USEPA requirements, 2) cohere with existing planning efforts such as Comprehensive Land Use Plans and conform to the and Neighborhood Revitalization Strategy Area Plan for the BGRA, 3) owners sign an access agreement and partner with the City on environmental studies, 4) have reuse potential of private sector businesses, affordable housing, green space, or other public use, 5) have a perception of contamination hindering development, 6) have potential impact on human health and environmental health, and 7) have a positive impact on the community when reused. We will use grant funds to expand our inventory of known brownfield sites.

2b. Task Descriptions and Budget Table (20 points)

2.b.i. Task Descriptions (15 points)

A planning, tracking and oversight program to ensure funds are expended in a timely manner will be used. Mr. Nick Cook will be our formal grant manager and Mr. Matt Powell will be our assistant grant manager and QA/QC officer. Performance will be tracked in quarterly reports to the USEPA. We will measure project performance by tracking specific project outputs.

Task 1 – Site Selection, Inventory & QAPP (\$19,600)

This task includes completing site eligibility profiles, preparing QAPPs, meeting with property owners, updating the inventory of brownfields, and identifying properties that may benefit from assessments. Hazardous Substance Grant funds will be used to evaluate the former PET Milk facility, a tobacco storage and cigarette factory, two scrapyards, two abandoned landfills, a former coal yard and a coal-fired power plant, and numerous blighted sites. Petroleum grant funds will include evaluation of two scrap yards, and up to five former gas stations. *Outputs:* 1) GIS-based database (50 hours @ \$100 per hour) (\$5,000), 2) Generic QAPP, (30 hours @ \$100 per hour), (\$3,000) 3) On-Site Inventories/Meetings (4 meetings @ \$900 each), (\$3,600) Review of Sanborn Maps and studies of regulatory data (80 hours @ \$100 per hour) (\$8,000).

Task 2 - Phase I/Phase II ESA (\$239,000)

This task includes the completion of Phase I ESAs of approximately 12 brownfield sites for approximately \$3,250 each (estimated \$39,000). It also allows development of site-specific QAPPs (SSQAPPs) and Phase II ESAs of 8 sites by a qualified environmental consultant for approximately \$25,000 each (estimated \$200,000). To gain Bona Fide Prospective Purchaser (BFPP) status for a potential buyer, Phase I & II ESAs will be prepared in conformance with American Society for Testing and Materials (ASTM) E1527-13 and ASTM E1903-97. Petroleum funds will be used to assess scrapyards, a coal yard, and former gas stations that often contain underground storage tanks (USTs). To complete UST assessment it may be necessary to remove and properly dispose of tanks. *Outputs:* 12 Phase I ESAs, and 8 Phase II SSQAPPs and 8 ESAs.

Task 3- Remedial and Planning Design (\$14,000)

This task includes the completion of up to 4 ABCAs at a cost of \$3,500 each, depending on the size of the properties involved, the nature and extent of contamination, and the number of cleanup alternatives evaluated. We will submit the ABCA documents to the KDEP and USEPA for review and comment. *Outputs:* 4 ABCAs.

Task 4- Outreach, Meetings, Programmatic Expenses, & Travel (\$27,400):

For identified sites, this would cover only eligible programmatic activities such as:

- Completion of community outreach and education plan (\$4,000 personnel)
- Meeting materials and advertisement (12@350) (\$4,200 supplies)
- Contractor assistance in 10 meetings (10 @ 900 per meeting) (\$9,000 contractor)
- Presentations/meetings with stakeholders, the public, potential developers, lenders, neighborhood groups, and other parties. (12 @ \$200 per meeting) (\$2,400 for personnel)
- Preparation of quarterly reports (12 @ \$110each) (\$1,300 for personnel)
- Preparation of final reports and project management (In-Kind)
- Training (6,500 Travel).

Ongoing grantee training will include attendance of two City staff members at three brownfield conferences and three Kentucky-based environmental training seminars (typically free registration). The budgets include: airfare: 2 persons for 3 conferences @ \$1,200 per trip (for 2 persons) or (\$3,600); lodging 2 persons @ \$110 each night for 4 days and 3 trips or (\$2,640); per diem of \$64 each day or (\$512). Travel Budget: (\$6,500) for personnel and travel expenses. *Outputs:* Education/outreach plan, 12 newsletters/brochures, 12 public meetings, 12 quarterly reports, closeout report, ACREs database filled, and conference/workshop attendance.

ii. Budget Table (5 points)

Project Budget – Hazardous Substances					
	Task 1- Inventory of	Task 2-Phase I/Phase II	Task 3- Remedial	Task-4 Community	Total

	Sites/Quality Assurance Project Plan	ESA	Planning and Design	Outreach and Travel ¹	
Personnel				\$4,800	\$4,800
Travel ¹				\$4,100	\$4,100
Supplies ²				\$2,800	\$2,800
Contractual ³	\$13,000	\$160,000	\$9,300	\$6,000	\$188,300
Total Budget	\$13,000	\$160,000	\$9,300	\$17,700	\$200,000
Project Budget – Petroleum Assessment					
	Task 1- Inventory of Sites/Quality Assurance Project Plan	Task 2-Phase 1/Phase II ESA	Task 3- Remedial Planning and Design	Task- 4Community Outreach and Travel ¹	Total
Personnel				\$2,900	\$2,900
Travel ¹				\$2,400	\$2,400
Supplies ²				\$1,400	\$1,400
Contractual ³	\$6,600	\$79,000	\$4,700	\$3,000	\$93,300
Total Budget	\$6,600	\$79,000	\$4,700	\$9,700	\$100,000

¹ Travel to brownfields-related training conferences, ² Supplies for community outreach include: copy services for distributed materials, ³ The applicant will comply with the procurement procedures contained in 40 CFR 30

2c. Ability to Leverage (5 points)

The BGRA has the lowest incomes, highest unemployment rates, greatest concentration of minority and single mother households, and the oldest housing stock in the City. The City has designated 80% of its \$520,000 annual allocation of CDBG funding from HUD and allocated \$200,000 annually from the General Fund to make neighborhood improvements, affordable housing, and improved economic opportunity. CDBG funding will assist with brownfields cleanup through acquiring properties, lead paint and asbestos abatement, and demolition of blighted structures. In addition to CDBG and brownfields funding we will work closely with government agencies, developers, and local organizations to seek out and gain more funds.

- KDEP Site-Specific Assessments. The KDEP's brownfields program provides site assessments for Phase I & II ESAs, and cleanup planning work. Using funds from its annual Section 128(a) grant from USEPA, KDEP has conducted numerous site assessment activities.
- USEPA Targeted Brownfields Assessments. We will work with the USEPA Region 4 team to apply for targeted brownfields assessments, as available and necessary.
- USEPA Competitive Assessment Grant Funding. We will evaluate applying for additional USEPA competitive grant funding for assessment, which is available for up to \$200,000 per site for petroleum and hazardous substance contamination.
- USEPA Competitive Cleanup Grant Funding. Assessment grant funding will be used to prepare sites. Our next step will be to apply for cleanup funding.
- Economic Development Administration (EDA). We will collaborate with EDA to determine if funds can be obtained for assessment and cleanup.
- The City of Bowling Green Board of Commissioners allocates \$200,000 each year to the Neighborhood Improvements Program. These funds could be used for brownfield cleanup.
- Valued at \$7,800, approximately 200 City staff hours will be used as in-kind for activities to perform programmatic duties. In-kind services provided are detailed in an attachment D.

3. Community Engagement & Partnerships (35 points)

3a. Engaging the Community (15 points)

3.a.i. Community Involvement Plan (10 points)

The BGBC will assist in site identification, prioritization, and selection to best meet project community outcomes. The BGBC will include stakeholders from the public and private sector including, City staff, WKU, government & community organizations, and private citizens from the BGRA. Public meetings at major milestones in the project include: 1) a kickoff meeting; 2) completion of Phase I & II ESA activities; and 3) during reuse planning and development of remedial action plans; 4) targeted community meetings described below. We will hold the grant kick-off meeting when we receive a Cooperative Agreement to establish the BGBC. Once we've procured our environmental consultant the first public BGBC meeting will begin with visioning sessions for developing a unified community approach for implementing the program. The consultant will prepare the generic QAPP and other planning documents. The City will prepare a brownfields presentation for public meetings. The public will have the opportunity to present sites to the BGBC for approval. Once a site is approved the consultant will conduct the Phase I/II ESAs and prepare ABCAs. The City will submit quarterly and annual reports to the USEPA and prepare closeout documents in accordance with our approved USEPA work plan. The grant coordinator will oversee the grant work to ensure compliance with the approved work plan and Cooperative Agreement. We will conduct widespread outreach by meeting citizens in their neighborhoods to connect directly with residents in the community.

Public Outreach: The stakeholders listed above will coordinate our work to ensure the public is engaged, sufficient data is collected to make decisions, and USEPA grant requirements are met. The City's Neighborhoods Coordinator, Karen Foley, works closely with all City departments to help deliver City services to citizens and neighborhoods, and provide technical support and training to neighborhood organizations. Through affiliations with neighborhood organizations and private citizen BGBC members, Karen will ensure that residents from the BGRA are properly represented and involved in the planning and implementation of our project. On sites posing considerable risk to the community, education concerning the environmental risks will be provided by the consultant. The public, particular businesses, community and neighborhood organizations, will provide expert knowledge and help make the City's brownfields program a success. The public is involved through; quarterly meetings, distribution of a program brochure and fact sheets on progress, and posting on social media and our website. We will educate the community about human health risks, brownfields development, and other brownfields-related issues. The community will be informed of and invited to the meetings through social media, newspaper, mailings, and emails. Quarterly meeting agendas include: 1) a guest speaker, 2) KDEP representation, 3) educational sessions, 4) presentations for approval of Phase I & II ESA's, 5) final voting on which sites to fund. Our website will display meeting minutes.

3.a.ii. Communicating Progress (5 points)

The BGBC will distribute key information to citizens in the community through, the local newspaper, mailings, emails, our website, and neighborhood organizations. Before each public meeting a fact sheet and summary of progress will be circulated using methods noted above. Questions and comments will be a part of each public meeting. The annual report will be on the City's website showing progress made. We know that extensive public participation leads to a successful project. The City has a language access plan and will provide information translated in any of the more than 40 spoken languages here when needed. Our full time International Communities Liaison will facilitate our efforts with people no matter what language they speak.

3b. Partnerships with Government Agencies (9 points)

3.b.i. Local / State/ Tribal Environmental Authority (5 points)

The City has received a letter of commitment and support for this project from the KDEP's Brownfield Coordinator, Herbert Petitjean. Herb and his team will play an advisory role on the BGBC by attending and conducting presentations at BGBC meetings, meeting with property owners of targeted sites, and securing other funding for brownfields cleanup.

The Warren County Division of Stormwater Management is in full support of this project. The director, Jack Wright, has agreed to serve on the BGBC, provide educational programs to the public on brownfields effects on the environment and water resources, and distribute brownfield information through their mailing database and television media outlets.

The City and the State of Kentucky have an excellent working relationship, partnering frequently. The City and the KY Division of Waste Management (KDWM) have completed our third cooperative effort to rehabilitate pre-RCRA (Resource Conservation and Recovery Act) Subtitle D landfills. The City has received almost \$3.5 million in funding from (KDWM) for improving two City Landfills. A fourth effort began this year under this program.

3.b.ii. Other Governmental Partnerships (4 points)

The Technical Assistance to Brownfield Communities Program (TAB) at the New Jersey Institute of Technology agreed to participate in our project by assisting with the procurement of an environmental consultant, leading visioning sessions for the BGBC, navigating regulatory processes, and obtaining other funding sources for redevelopment of identified sites.

Dr. Jason Polk, Director of the WKU Center for Human GeoEnvironmental Studies, is serving on the BGBC. Dr. Polk will conduct educational sessions on the effects of brownfields on ground water supply in karst environments. Dr. Polk will share brownfield program information on www.underbgky.org, a website dedicated to public education on karst issues.

The Barren River District Health Department serves the eight-county area that includes Warren County. They are in support of our project and will assist this project through notifying the City of contaminated sites, required cleanup measures, and more.

The Greenways Commission of Bowling Green is currently working in the BGRA to increase connectivity of existing walking and bicycling facilities to greenways. They are serving as a member on the BGBC where they will provide technical assistance on connecting and developing greenways at brownfield sites, and seeking grant funds to develop new greenways.

The KDEP will be a close advisor to the City during our project by attending meetings, meeting with property owners, and seeking funding for cleanup. We will work with the KDEP to use a health-risk-based approach to determine the appropriate cleanup levels as afforded by state and federal law if clean closure cannot be attained.

Through current partnerships with HUD and the FTA, the City will capitalize on current and future funding opportunities with these agencies to assist with the redevelopment of brownfield sites. The City will seek participation from these agencies for providing better public transportation and pedestrian facilities, and affordable housing for our low income population.

3c. Partnerships with Community Organizations (9 points)

3.c.i. Community Organization Description & Role (5 points)

The Bowling Green Chamber of Commerce is in support of this project. The Chamber identifies and markets properties to potential investors and knows this project will result in additional marketable inventory for our city. The Chamber will assist the City with reuse planning efforts by discussing brownfield sites with developers to promote redevelopment.

Habitat for Humanity Bowling Green Warren County (HFH), will assist to locate and clean up brownfields in our community. HFH will assist by serving as a member of the BGBC, and providing affordable housing as part of a brownfields reuse and redevelopment plan.

Through the City's Neighborhoods Coordinator outreach will be made to neighborhood organizations, faith based organizations, businesses, stakeholders, and all neighborhood residents. Neighborhood residents will be recruited to serve on the BGBC to help identify underutilized and contaminated properties, conduct outreach efforts through their neighborhood organizations, select sites for assessment, and provide input on the redevelopment process.

James. R. Adams and Associates, a professional land surveying firm with more than 40 years of business history in Bowling Green, is committed to serving on the BGBC and providing insight into contaminated and underutilized sites. Mr. Adams is frequently retained by developers and builders in our community because of this expansive historical knowledge. Mr. Adams will link developers to reclaimed properties for redevelopment.

3.c.ii. Letters of Commitment (4 points)

We have obtained eight letters of commitment, provided in Attachment C.

3.d. Partnerships with Workforce Development Programs (2 points)

The City will link community members in the BGRA to potential employment opportunities associated with our brownfield projects and will follow EPA procurement policies to seek out Disadvantaged Businesses Enterprise firms for execution of all our grant funds. The City will continue to seek to provide employment and contracting opportunities to low income residents in connection with projects and activities in their neighborhoods. Such as Section 3 which includes: placing Section 3 brochures in the information carousel located in the City's Section 8 Housing Choice Voucher Program waiting room; including a Section 3 memo in a monthly newsletter distributed to approximately 600 public housing residents; and mailing a Section 3 memo and brochure to approximately 100 licensed contractors from the area. Through newspaper advertisements, low income residents will be made aware of and encouraged to participate in projects and activities related to the brownfield program.

4. Project Benefits (25 points)

4.a. Welfare, Environmental, and Public Health Benefits (13 points)

The overall welfare, environment, and public health of our community will improve by assessing, cleaning up, and restoring brownfields properties to constructive reuse. Brownfields have increased the unemployment, poverty rates, and health risks that plague our neighborhoods. Evaluating, ranking, and prioritizing our brownfields will help us address our welfare, environmental, and public health issues mentioned in the first section of this application such as high unemployment, poverty, and cancer rates. Our legacy health issues can only be addressed if we know where the sources are, the effects they have on our citizens, and how to allocate limited funds. We'll reduce our poverty rates and improve the health, quality of life, and community livability. We will focus through our already-established outreach program on restoring select brownfields that can lead to job creation and better health. Identifying and cleaning up contaminated soil from Brownfields results in cleaner groundwater and surface water for all area residents as well as all communities downstream of Bowling Green. Removing contaminated soils, building materials, and other sources of environmental hazards will eliminate the accessibility of these health hazards to the area residents and increase positive health outcomes. Removing hazards from brownfield sites will improve our community's health and welfare.

The benefits and positive outcomes of the grant work will include: healthier and more livable communities, lower incidence of disease, longer life expectancy, healthier children, more

jobs, and less poverty. We identified specific welfare, environmental, and public health impacts in the Community Need Section of this application which include; 1) presence and accessibility of hazardous substances, 2) general poor health outcomes, 3) continued spread of contamination, and 4) high cancer rates. Brownfield sites hindering economic redevelopment and contributing to environmental and public health problems include: 1) legacy scrap yards, 2) gas stations, 3) factories (textile, foods, and cigarette), 4) a coal powered plant, and 5) two, closed landfills. Overall our specific benefits are 1) Reduced soil and groundwater contamination by assessing and remediating former industrial sites and commercial properties especially those that impact subsurface karst, 2) cleanup of other identified areas of contamination to set the stage for adaptive reuse, 3) as well as ensuring that clean soils are available for subsistence gardening, children playing, and pedestrian pathways.

4.b. Economic and Community Benefits (12 points)

The City's ability to secure federal funding for brownfields inventory, assessment, remediation, and redevelopment is essential to make the long-term improvements needed to create economic opportunity in the BGRA. The area currently relies heavily on investments from the government and non-profit sectors. Redevelopment will have benefits for the BGRA, and the entire city, including new jobs, new private investment, and ultimately increased property values which provide funds for City services. As the population grows, it is essential that business opportunities increase in the BGRA to create jobs for neighborhood residents. Brownfield assessments are the first step in stimulating business by identifying and quantifying barriers to commercial, retail, green-space, and residential opportunities. The City will use assessment resources to leverage redevelopment at brownfield sites, removing tax drains and barriers to reinvestment.

The cost of City services exceeds taxes generated by brownfield sites. Redevelopment with residential or commercial uses will help to equalize the demand on public funds with the public funds generated by each site due to increased valuation. Increased property values will increase resident's wealth through equity and encourage needed investment in adjacent neighborhoods. Redevelopment with commercial or industrial uses will contribute new public funds and new jobs for the BGRA's residents.

Redeveloping brownfields will help the BGRA increase interest from potential developers for commercial and residential properties. Availability of rehabilitated former brownfield properties will facilitate entry of these businesses. The City will look at each brownfield site and promote rehabilitation for possible commercial ventures such as a grocer, residential uses, and green space, promoting a healthier environment for residents near a brownfield.

The entire BGRA suffers from the impact of brownfield sites. The loss of commercial businesses and individuals moving to other locations has left the area with a high concentration of low-income residents. As seen in the above demographic table, 10% of persons in the BGRA don't own a vehicle and 12% walk to work. These factors demonstrate a strong need for the location of new industry in the BGRA. USEPA funding assistance will allow us to clear away some of the barriers to growth in this area. Thus increasing wealth and opportunity for these residents while also mitigating potential risks to human health and the environment.

Brownfield funding will strengthen the City's existing Neighborhood Revitalization Strategy Area plan to make long term neighborhood improvements in the BGRA. Outcomes include: neighborhood revitalization, reduced unemployment, a higher tax base, lower poverty, better health, a lasting healthy community. Environmental education that has led to a better

awareness of how Brownfield sites can impact our daily lives and the value in eliminating them. A continuing Brownfields Advisory team after the grant ends.

5. Programmatic Capability and Performance (40 points)

5.a. Audit Findings (2 points)

The City has an extensive history of managing federal and state funds and has never received any adverse audit findings relating to managing those funds. The City received over \$4,000,000 in federal funding last year. The City receives an annual single audit due to the amount of federal grant funds received each year, and is not aware of any adverse audit findings from past single audits. The City has not been required to comply with special "high risk" terms and conditions.

5.b. Programmatic Capability (23 points)

The City employs more than 600 people spanning 10 departments. The Neighborhood and Community Services Department (NCS) will oversee this project with assistance from the Public Works Department (PW). The NCS's Administration and Grants division is responsible for coordinating and overseeing all grants awarded to the City. The NCS Grants and Administration division employs a professional staff providing a diverse base of experience and expertise. PW is a 48-person organization dedicated to maintaining the 230 miles of city streets, 23 miles of storm sewers, 608 storm water injection wells and sinkholes, 106 miles of sidewalk, 23 traffic signals, and 310 city vehicles and major pieces of equipment. The PW Environmental Compliance Division (ECD) oversees all City compliance with regard to environmental standards with USEPA, U.S. Army Corps of Engineers, USDOT, and others. Further the ECD works throughout the community to ensure environmental compliance from residents and businesses.

With regard to the proposed project, Mr. Nick Cook, City Grants Coordinator, will be project director. Mr. Cook holds a bachelor's degree from Campbellsville University in Business Management, a master's degree from WKU in Administrative Dynamics, and has more than 10 years of experience with developing proposals and project management. Mr. Cook currently manages the City's CDBG Entitlement Program and 5307 Public Transit Formula Funding Program. Mr. Matt Powell, City Environmental Manager, will assist with developing the proposal and implementing the project. Mr. Powell holds a bachelor's degree in Environmental Health and Safety, and completed his course work toward a master's degree in Public health from WKU, and has over 10 years of environmental regulatory inspection and management experience. The City will oversee all phases of work, including issuing a request for qualifications and selecting an environmental consulting company. The City will be responsible for all quarterly and annual reports and submitting invoices to USEPA as required under the cooperative agreement. We also anticipate retaining the services of a qualified and experienced environmental consultant. Our procurement policies demand compliance with procedures outlined in 40 CFR 30 in the selection processes.

5.c. Measuring Environmental Results: Anticipated Outputs and Outcomes (5 points)

As mentioned in the budget section our *outputs* include: 1) GIS database with brownfields sites, 2) Generic QAPP, at least 8 meetings with property owners and stakeholders in the BGRA, 3) Desk-top review of BGRA environmental data, 4) 12 Phase I ESAs, 5) 8 Phase II ESAs and 12 SSQAPPs, 6) 4 ABCAs, 7) 12 project meetings with stakeholders, 8) 12 quarterly reports, 9) Updated ACRES Database 10) Completion Report & Project Closeout. Specific outcomes correlate back to our community need objectives. Outcomes include: 1) continuation of a Brownfields Advisory team even after the grant ends 2) Environmental education that has led to a better awareness of how Brownfield sites can impact our daily lives and the value in

eliminating them 3) a lasting healthy community 4) revitalization for a higher tax base, job creation, lower poverty levels and better health outcomes, such as a lower incidence of cancer.

5.d. Past Performance and Accomplishments (10 points)

5.d.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (10 Points)

5.d.ii.1. Purpose and Accomplishments (5 points)

- **Community Development Block Grant (CDBG)** – The City receives annual funding from HUD to address community development and housing needs across the jurisdiction. The City's goals for these funds are to provide quality affordable housing, increase economic opportunity, and make neighborhood improvements. Last year the City received \$522,000 which resulted in 163 families receiving rent and utility assistance, 23 kids receiving mentoring services, 57 individuals receiving training for starting a small business.
- **Federal Transit Administration (FTA) Section 5307** – Since 2003, the City has been a recipient of the FTA's 5307 funding program to operate public transit services across the City. Over the last 3 years, the City has received an average of \$1,000,000 annually from the FTA to provide fixed route transit service. The City partners with a local public agency to provide the service. More than 109,000 daily riders were served by the transit program during the course of 2016. Of those, approximately 7,800 were disabled persons.
- **Kentucky Division of Waste Management** – The KDWM awarded the City \$3.5 million to reduce leachate production at two City pre-RCRA Subtitle D landfills. The issues associated with leachate production were areas of ponding water on top of the landfill cap, a failing road system to support large trucks, side slopes sloughing, and beaver damage to a sediment retention basin. The City partnered with the KDWM to address these issues by installing fill dirt on the cap; placing 12 acres of geo-membrane material on the side of the landfill; re-rocking and re-ditching the roads; installing a pump system to push collected leachate collected in the current tanks to a new series of concrete tanks more accessible to the tanker trucks; and increasing the size of, and repairing damaged storm water basins.

5.d.ii.2. Compliance with Grant Requirements (5 points)

- The City has an excellent record of achieving benchmarks set by HUD for compliance with applicable CDBG requirements. Through demonstrating a strong history of meeting reporting deadlines and receiving excellent performance evaluations from past HUD monitoring, the City has received a 'very low-risk grantee' rating by HUD. In cooperation with HUD, the City continually takes corrective measures to develop and update CDBG Policies and Procedures to ensure the continued adherence to federal CDBG regulations.
- The City has a strong history of meeting the FTA 5307 regulation and reporting requirements. The City has never received any adverse audit findings related to this program. The City recently received its first triennial review from FTA, and received excellent marks. The review focused on compliance with federal FTA requirements in 17 areas. The FTA recommended and approved corrective measures of the City to develop grant management procedures to ensure the City continues to adhere to the applicable FTA regulations.
- The City's landfill rehabilitation project resulted in an overall success while maintaining all regulatory compliance and funding requirements.

Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: CITY OF BOWLING GREEN

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

ASSISTANCE TO COMMUNITIES THAT HAVE LIMITED IN-HOUSE

CAPACITY TO MANAGE BROWNFIELD PROPERTIES

Page Number(s): 4 & 5

Assessment Other Factors Checklist

Please identify (with an *x*) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	9
Recent natural disaster(s) (2012 or later) occurred within community, causing significant community economic and environmental distress.	
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	4 & 5